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December 17, 2015

BY ECF FILING

Honorable Gregory H. Woods
United States District Judge
Daniel Patrick Moynihan
United States Court House
500 Pearl Street, Room 2260
New York, NY 10007-1312

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MEMORANDUM ENDORSED

Re: *Trump Your Competition, Inc. v. Donald J. Trump*;
Misc. Proc. No. 15-Misc.-00400; In re Proceeding No.
91217618 (Pending before the U.S. Trademark Trial
and Appeal Board)

Dear Judge Woods:

We represent defendant Donald J. Trump in this action. Further to our conversation today with Your Honor's clerk Sarah Edwards, we write to request (i) adjournment to January 12, 2016 or January 25, 2016 of oral argument on Plaintiff's Motion for Order Compelling Compliance with Subpoena to Testify at Deposition, dated December 10, 2015 (the "Motion to Compel"), currently scheduled for December 29, 2015 and (ii) extension to January 4, 2016 of Mr. Trump's time to respond to the Motion to Compel, currently set for December 24, 2015.

On December 15, 2015, we contacted Plaintiff's counsel, Netra Sreeprakash of Kleinberg, Kaplan, Wolff & Cohen, P.C., in an attempt to obtain consensual extension of Mr. Trump's time to respond to the Motion to Compel and a brief adjournment of the oral argument date. We based our request on the fact that Plaintiff demanded responsive papers be served on Christmas Eve and that Plaintiff scheduled the oral argument date for December 29, 2015, when Mr. Trump's litigation counsel in this matter is not available. Although we offered to extend Plaintiff's testimony period in the pending Trademark Trial and Appeal Board proceeding — thereby avoiding any conceivable prejudice or harm to Plaintiff in adjourning the proposed oral argument date — Plaintiff is unwilling to accommodate our scheduling request.

This is Mr. Trump's first request to extend his time to respond to the Motion to Compel and to adjourn oral argument on that Motion.


Respectfully submitted,

Daniel H. Weiver / ECS

cc: Norris D. Wolff, Esq. and Netra Sreeprakash, Esq.
Counsel for Plaintiff-Applicant

Application granted. Mr. Trump's deadline to response to the Motion to Compel is extended to January 4, 2016, and oral argument will be held on January 6, 2016 at 2:30 p.m. before the judge then presiding in Part I.
SO ORDERED.

Dated: December 18, 2015
New York, New York


GREGORY H. WOODS
United States District Judge